

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

BRANDON CALLIER,

Plaintiff,

v.

**TAX DEFENDER LLC,
TAX DEFENDER USA LLC, and
THOMAS CAHILL**

Defendants.

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Case No. EP-22-CV-0181-FM

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND
TO PLAINTIFF’S COMPLAINT**

Defendants TAX DEFENDER USA LLC and THOMAS CAHILL respectfully file this Unopposed Motion for Extension of Time to Respond to Plaintiff BRANDON CALLIER’s (“Plaintiff”) Complaint as follows:

1. Defendant Thomas Cahill’s and Defendant Tax Defender USA LLC’s deadline to respond to Plaintiff’s Complaint is June 21, 2022. Defendants were only recently able to retain counsel admitted to practice in the Western District of Texas to represent them in this matter. Defendants and their counsel require additional time to gather information to adequately respond to the allegations in the Complaint. Defendants, therefore, request an additional 30 days to July 21, 2022, to file their answers or responsive pleadings to Plaintiff’s Complaint.

2. This extension is not sought for purposes of delay, but rather so Defendants may adequately confer with counsel to vet and address the factual allegations set forth in the Complaint, so Defendants may prepare an appropriate answer or response to Plaintiff’s Complaint.

3. Pursuant to Local Court Rule CV-7(G), Defendants' counsel conferred with Plaintiff regarding this motion and request for an extension of 30 days to answer or respond to Plaintiff's Complaint. Plaintiff agrees to this motion and is unopposed to the requested relief.

4. With the agreement of Plaintiff, therefore, Defendants request the Court to extend Defendants' deadline to file an answer or responsive pleading to July 21, 2022.

WHEREFORE, premises considered, Defendants request the Court to grant this Unopposed Motion for Extension of Time to Respond to Plaintiff's Complaint and to extend the deadline by which Defendants must file an answer or responsive pleading to July 21, 2022.

Respectfully submitted,

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Counsel for Defendants

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing was served on all parties and counsel of record via the Court's CM/ECF system and/or via regular mail in accordance with the Federal Rules of Civil Procedure on June 21, 2022.

/s/ Shelly W. Rivas
Shelly W. Rivas